

ROLLINS

ENVIRONMENTAL SERVICES

August 31, 1995

Mr. Duong Nguyen
Hazardous Waste Management Division H-4-1
U.S. EPA, Region 9
75 Hawthorne Street
San Francisco, California 94105

Dear Mr. Nguyen:

RE: U.S. EPA WARNING LETTER DATED AUGUST 16, 1995

This is in response to the warning letter dated August 16, 1995. The warning letter summarized the findings of a hazardous waste investigation conducted at Rollins OPC facility Located at 5756 Alba street Los Angeles, California on June 6, 1995.

Enumerated below are the facility's responses to the comments/issues raised in the warning letter.

Comment 1:

Submit documentation proving that the pot holes in the secondary containment concrete floor near tank # V-2 have been repaired.

Response 1:

During the inspection the area designated as the waste water treatment system was under construction to modify and modernize the treatment and waste storage capabilities. The new tank systems required new foundations in other to comply with design criteria in a seismic zone 4 area. During the inspection the inspectors observed some excavated concrete and some borings made to check the thickness of the existing concrete. New foundations have since been constructed in these locations in accordance with good engineering practice and the tank manufacturer's requirements. On August 7, 1995 an independent California Registered Engineer certified the new foundation as complete and ready for use. A copy of the certification is enclosed for your information.

Comment 2:

Submit documentation proving that a signed copy of the outgoing manifest # LAA 332912 was returned to Rollins OPC from the designated treatment, storage, and disposal facility(TSDF). Also provide documentation proving that as a standard operating procedure Rollins OPC will contact the TSDF if the manifest copy has not been returned within 35 days of the initial shipment date and file an exception report if a copy has not been returned within 45 days of the initial shipment date.

ROLLINS  INC.

5756 Alba Street • Los Angeles, California 90058 • FAX: (213) 585-9214 • Phone: (213) 585-5063

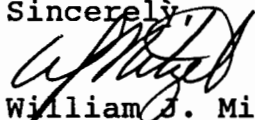
page 2.

Response 2:

Enclosed please find a copy of the signed manifest # LAA 3329212. The Manifest was signed on April 13, 1995. Rollins OPC has instituted a system by adding a column on the outgoing shipment logs to indicate when the 35 days will be due. This will ensure that staff are cognizant of the 35 day limit for the return of the manifest. When a manifest is approaching the 35 days limit a call will be placed to the TSDF to remind them to send the signed manifest immediately. Incidents of late returns will be highlighted on the tracking log and corrective actions will be taken where appropriate.

I trust that the information provided in this letter will adequately answer the issues raised in the said warning letter, and return the facility to compliance. If you have any further questions please contact me at (213) 585-5063.

Sincerely,



William J. Mitzel
President

STATE OF LOUISIANA
DEPARTMENT OF ENVIRONMENTAL QUALITY
HAZARDOUS WASTE DIVISION
P.O. BOX 82178
BATON ROUGE, LOUISIANA 70884-2178

PLEASE PRINT OR TYPE (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-96

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. C A I D 0 5 0 8 0 6 8 5 0 0 1 7 1 8	Manifest Document No. 2	27 Page 1 of 2	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address ROLLINS OPC 5756 ALBA STREET LOS ANGELES, CA 90058			A. State Manifest Document Number LAA 3329212		
4. Generator's Phone (213) 585-5063 ATTN: STEVE REILLY			B. State Generator's ID		
5. Transporter 1 Company Name Mettluch Inc.			C. State Transporter's ID 606395		
6. US EPA ID Number D E D 9 8 1 1 1 0 1 6 6			D. Transporter's Phone (800) 228-0147		
7. Transporter 2 Company Name			E. State Transporter's ID		
8. US EPA ID Number			F. Transporter's Phone		
9. Designated Facility Name and Site Address ROLLINS ENVIRONMENTAL SERVICES (LA) INC. 13351 SCENIC HIGHWAY BATON ROUGE, LA 70807			G. State Facility's ID LA 0 1 0 1 0 3 9 5 1 2 7		
10. US EPA ID Number			H. State Facility's ID		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)			12. Containers No. Type	13. Total Quantity	14. Unit Wt/Vol
a. RQ, Waste Flammable Solid, n.o.s., 4.1, UN1325, III(Spent activated carbon)			60 0 8 6 D F 1 2 9 0 0	0 9 0 0 0	P
b. RQ, Waste Flammable Solid, n.o.s., 4.1, UN1325 III(Contains Methanol)			0 1 2 D F 0 2 5 0 0	0 2 5 0 0	P
c. RQ, Hazardous Waste Solid, n.o.s., 9, NA3077, II(Acetone, Xylene)			0 1 0 D F 0 1 7 5 0	0 1 7 5 0	P
d. KQ, Waste Poisonous Solid, n.o.s., 6.1, UN2811 II(Contains Cyanide)			1 0 3 D F 1 5 4 5 0	1 5 4 5 0	P
J. Additional Descriptions for Materials Listed Above 11a) 18859: D001 11b) 33141: D001 11c) 37519 11d) 38947: D029, F007.			K. Handling Codes for Waste Listed Above 11a) 18859: D001 11b) 33141: D001 11c) 37519 11d) 38947: D029, F007.		
15. Special Handling Instructions and Additional Information IN CASE OF ACCIDENT OR SPILL CONTACT CHEMTREC AT (800) 424-9300. AVOID CONTACT WEAR PROTECTIVE GEAR WHEN HANDLING. IF UNABLE TO DELIVER RETURN TO THE GENERATOR. Trailer #: 6433					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimize the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name STEPHEN REILLY			Signature Stephen Reilly Month Day Year 0 6 0 5 9 5		
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name BRUCE L. LOUWEN			Signature Bruce L. Louwen Month Day Year 10 0 5 9 5		
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name			Signature Month Day Year		
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name Signature Month Day Year					

IF SPILLED IN LOUISIANA CALL THE LOUISIANA HAZMAT UNIT AT 504/925-6595 (DAY OR NIGHT)

COPY 4